

April 24, 2007

ViaPDF: tponticello@LasVegasNevada.GOV

Ms. Teri Ponticello Office of Business Development 400 Stewart Avenue, 10th Floor Las Vegas, NV 89101

Subject:

Certificate-Disclosure of Ownership/Principals ("Disclosure")

Union Park Project

Newland Communities, LLC

Dear Teri:

As we discussed today, the Contracting Entity named in the above Disclosure, Newland Communities, LLC is a limited liability company whose sole member is American Newland Communities, LP ("ANC").

ANC has one general partner and two limited partners. I am providing a flow chart which reflect who those partners are.

Please contact me with any further questions you may have on this matter.

Yours very truly, Newland Communities, LLC

Dee Valle

Director of Legal Services

Enclosures

CC:

R. Brandin

D. Hageman

S. Van Gorp

D. Hume

American Newland Communities, LP Hunt/Newland Ownership Structure

DO NOT DISSEMINATE TO THIRD PARTIES WITHOUT APPROVAL BY DIRECTOR, LEGAL SERVICES

